

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

CHARLES CURTIS et al.,

Plaintiffs,

v.

**ALCOA INC., Individually and as
Fiduciary of the Employees' Group
Benefits Plan of Alcoa Inc., Plan II,**

Defendant.

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Civil Action No: 3:06cv448

DEFENDANT ALCOA INC.'S MOTION TO FILE UNDER SEAL

Defendant Alcoa Inc., by its counsel, respectfully moves this Court pursuant to Local Rule 26.2 for an order granting leave to file under seal its Memorandum of Law in Support of its Motion for Summary Judgment, Statement of Undisputed Material Facts, Declaration of Benjamin Gruenstein and accompanying exhibits to the Declaration of Benjamin Gruenstein. In support of this motion, Defendant respectfully represents as follows:

1. Defendant's Memorandum of Law in Support of its Motion for Summary Judgment, Statement of Undisputed Material Facts, Declaration of Benjamin Gruenstein and accompanying exhibits to the Declaration of Benjamin Gruenstein contains confidential, private and/or sensitive information pertaining to the Defendant.

2. That information falls under the scope of this Court's July 6, 2007, Protective Order for Production and Usage of Documents, Information, and Testimony.

Accordingly Defendant respectfully requests that this Court grant its motion to
file the above-referenced documents under seal.

May 20, 2008

Respectfully Submitted,

ALCOA INC.

By: s/Evan R. Chesler
Counsel

John A. Lucas (Tenn. Bar No. 011198)
MERCHANT & GOULD, P.C.
Suite 203
110 McGhee Tyson Boulevard
Alcoa, Tennessee 37701
865.380.5978 (telephone)
865.380.5999 (facsimile)
jlucas@merchantgould.com

*James P. Naughton (Va. Bar No. 25923)
HUNTON & WILLIAMS LLP
500 East Main, Suite 1000
Norfolk, Virginia 23510
757.640.5300 (telephone)
757.625.7720 (facsimile)
jnaughton@hunton.com

*Evan R. Chesler (N.Y. Bar No. 1475722)
*Daniel Slifkin (N.Y. Bar No. 2439768)
CRAVATH, SWAINE & MOORE LLP
825 Eighth Avenue
New York, New York 10019
212.474.1000 (telephone)
212.474.3700 (facsimile)
echesler@cravath.com / dslifkin@cravath.com

(*Admitted pro hac vice)
Counsel for Defendant Alcoa Inc.

To:
Gregory F. Coleman
Coleman & Edwards
4800 Old Kingston Pike, Suite 120
Knoxville, Tennessee 37919
865.257.0080 (telephone)
865.247.0081 (facsimile)
gcoleman@colemanedwardspc.com

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**[PROPOSED] ORDER GRANTING
DEFENDANT ALCOA INC.'S MOTION TO FILE UNDER SEAL**

This matter having come before the Court on the Motion of Defendant Alcoa Inc. to File Under Seal its Memorandum of Law in Support of its Motion for Summary Judgment, Statement of Undisputed Material Facts, Declaration of Benjamin Gruenstein and accompanying exhibits to the Declaration of Benjamin Gruenstein, and the Court, having reviewed the papers filed in support of this motion, and for good cause shown;

IT IS, on this ___ day of May, 2008,

ORDERED that Defendant Alcoa be granted leave to file the above-referenced documents under seal.

Thomas W. Phillips
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2008, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

Parties may access this filing through the Court's electronic filing system.

s/Evan R. Chesler
Counsel